

MUKASEY

YOUNG

570 Lexington Avenue, Suite 3500
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March 21, 2024

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Trevor Milton, 1:21-cr-478 (ER)

Dear Judge Ramos:

Defendant Trevor Milton respectfully requests that this Court modify his current bail conditions to allow him to travel within the continental United States. We understand this is necessary because Mr. Milton wishes to have more flexibility in choosing medical care options for his wife.

As it stands, Mr. Milton is permitted to travel to the Southern District of New York, the Eastern District of New York, Utah, Wyoming, Arizona, Washington, D.C., Idaho, Virginia, Colorado (and points in between) (*see* ECF No. 95, March 10, 2022 Memo Endorsement on Motion to Modify Conditions of Release, Unopposed).

It is our understating that: the government defers to Probation regarding this request; Probation takes no position on the request as Mr. Milton is still on Pretrial Supervision; and Pretrial does not object as long as Probation had no objection and Mr. Milton remains in contact regarding any travel plans.

Respectfully submitted,

/s/ Marc L. Mukasey
Marc L. Mukasey
Torrey K. Young

cc: AUSA Nicolas Roos (via ECF)
AUSA Mathew Podolsky (via ECF)
Probation Officer Morgan Wahlen (via e-mail)
Probation Office Jana Nieman (via e-mail)